

Mr. David L. Rader
Pfizer Inc.
P.O. Box 88
Terre Haute, IN 47808

Re: 167-12620
First Administrative Amendment to
MSM 167-12293-00013

Dear Mr. Rader:

Pfizer Inc. was issued a Minor Source Modification (MSM) on August 2, 2000 for a 70,000 pound of steam per hour boiler, identified as TEMP. A letter requesting a typographical error correction regarding a boiler capacity (the MSM incorrectly stated 13 MMBtu/hr, however, it was actually 91 MMBtu/hr) and language clarification with the following portions of the MSM, was received on August 14, 2000: "Emission Limitations and Standards", "Compliance Monitoring Requirements", and the "Record Keeping and Reporting Requirements". The permit is hereby administratively amended as follows:

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1] [40 CFR 60.42c(d)]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO₂ emissions from the ~~thirteen (13)~~ **91.2** MMBtu per hour oil-fueled boiler shall not exceed five tenths (0.5) pounds per million Btu heat input; or
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times **when combusting fuel oil**, including periods of startup, shutdown, and malfunction.

D.1.3 Opacity Limitation [326 IAC 12-1] [40 CFR 60.43c(c)]

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall not cause to be discharged into the atmosphere from this facility any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

Pursuant to 40 CFR 60 Subpart Dc, the opacity standard applies at all times **that coal, wood, or oil is being combusted**, except during periods of startup, shutdown, or malfunction.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section-B **C, Condition 2 of the Minor Source Modification (167-12293-00013)** - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

D.1.9 Visible Emissions Notations

Pfizer Inc. requested that this condition be modified to note that visible emissions (VE) notations are required only when Pfizer is combusting fuel oil. However, condition D.1.9 part (a) of the Minor Source Modification states: "Visible emission notations of the Temp boiler stack exhaust shall be performed once per shift during normal daylight operations when combusting fuel oil and exhausting to the atmosphere." Therefore, no change was implemented.

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.4-7 **1.9**, the Permittee shall maintain records of visible emission notations, **when combusting fuel oil**, of the boiler Temp stack exhaust once per shift.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. Darren Woodward, at (812) 462-3433, extension 15.

Sincerely,

George M. Needham
Director
Vigo County Air Pollution Control

Attachments

DKW

cc: Mindy Hahn - IDEM
Winter Bottum - IDEM

Pfizer Inc.
Terre Haute, Indiana
Permit Reviewer: Rob Harmon

First Administrative Amendment 167-12620-00013
Reviewer: Darren Woodward

Page 2 of 2
Minor Source Modification No. 167-12293-00013

**PART 70 MINOR SOURCE MODIFICATION
OFFICE OF AIR MANAGEMENT
and
VIGO COUNTY AIR POLLUTION CONTROL**

**Pfizer Inc.
100 Pfizer Drive
Terre Haute, Indiana 47802**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 167-12293-00013	
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: August 2, 2000
First Administrative Amendment T167-12620	Pages affected: 12, 13, and 14
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: October 11, 2000

A Preventive Maintenance Plan, in accordance with Section C, Condition 2 of the Minor Source Modification (167-12293-00013) - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.6 Sulfur Dioxide - Initial Performance Test [326 IAC 12-1] [40 CFR 60.44c(b) and (h)]

Pursuant to 40 CFR 60, Subpart Dc, the first day of the initial performance test shall be scheduled within 30 days after the facility achieves the maximum production rate, but not more than 180 days after initial startup.

Pursuant to 40 CFR 60, Subpart Dc, where the Permittee seeks to demonstrate compliance with the SO₂ standards based on fuel supplier certification, the performance test shall consist of the certification, the certification from the fuel supplier, as described under 40 CFR 60.48c(f)(1).

D.1.7 Opacity - Initial Performance Test [326 IAC 12-1] [40 CFR 60.45c(a)]

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall conduct an initial performance test for opacity as required under 40 CFR 60.8, and shall conduct subsequent performance tests as requested by the Administrator, to determine compliance with the standards using Method 9 (6-minute average of 24 observations) for determining the opacity of stack emissions. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.8 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 12-1] [40 CFR 60.48c(f)]

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification (as described in 40 CFR 60.48c(f)); or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Visible Emissions Notations

- (a) Visible emission notations of the Temp boiler stack exhaust shall be performed once per shift during normal daylight operations when combusting fuel oil and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.9, the Permittee shall maintain records of visible emission notations, when combusting fuel oil, of the boiler Temp stack exhaust once per shift.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 NSPS Record Keeping Requirements [326 IAC 12-1] [40 CFR 60.48c]

Pursuant to 40 CFR 60.48c(g) the Permittee shall record and maintain records of the amounts of each fuel combusted each day.

Pursuant to 40 CFR 60.48c(i) all records required under this regulation shall be maintained by the Permittee for a period of two years following the date of such record.